

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
Case No. 19-CV-4650

RAFAEL FOX, PAUL D'AURIA and JILL SHWINER,

Plaintiff,

V.

STARBUCKS CORPORATION d/b/a
STARBUCKS COFFEE COMPANY,

Defendants.

PORTION OF TRANSCRIPT DESIGNATED CONFIDENTIAL

TRANSCRIPT OF ZOOM VIDEOCONFERENCE OF

CARLA RUFFIN

TRANSSCRIPT of the stenographic notes
ings in the above-entitled matter, as
before TAB PREWETT, a Registered
eporter, a Certified LiveNote
Certified Shorthand Reporter with all
t remotely via Zoom videoconference o
21, 2020, commencing at 10:05 a.m.

Carla Ruffin

it was for her to see what she could do to help the managers get to where they needed to be. As time progressed, she -- and she audited stores or did store visits and -- I remember Mr. Rivera specifically -- some of those managers were termed.

Q They were involuntarily terminated?

8 A Yes. There were some managers chose
9 to leave and some -- and I don't remember
10 specifically the number, but there were some
11 terminations.

12 Q And to be clear, we're talking about
13 terminations of store managers in the same district
14 as Mr. Fox when Ms. De La Cruz was the district
15 manager?

19 Q And do you remember one way or another
20 whether Ms. De La Cruz endorsed and advocated for
21 Mr. Fox to receive "manager of the quarter"
22 recognition during the short period of time when she
23 was district manager of his district?

24 A I don't -- I don't recall.

25 O When was the most recent write-up or

1 | Carla Ruffin

2 written coaching that Mr. Fox received prior to his
3 termination?

4 A I have no idea.

5 Q How many years was Mr. Fox a store
6 manager at Starbucks?

9 Q How many years was he an employee of
10 Starbucks?

11 A I don't have that knowledge.

12 Q Did you consult with any district
13 managers in the course of -- withdrawn. Withdrawn.

Just to confirm, what was the full title, if you were using the fullest, most formal actual title, of your position in New York?

17 A Regional director of operations.

18 Q Is there any more to the title that
19 designated your area?

20 A Not in the title.

21 MR. GRAFF: I have no further

22 questions at this time, unless Mr. Moy has
23 any?